

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	: Bankruptcy No. 21-10953-AMC
Frank Bradley Szell	: Chapter 13
Debtor	:
HSBC Bank USA, N.A., as Trustee, on behalf	:
of the Certificate Holders of the Deutsche Alt-	:
A Securities, Inc. Mortgage Pass-Through	:
Certificates, Series 2007-AB1 c/o Select	:
Portfolio Servicing, Inc.	:
Movant	:
vs.	:
Frank Bradley Szell and Traci A. Szell (Non-	:
filing Co-Debtor)	:
Debtor/Respondent	:
and	:
Kenneth E. West, Esquire	:
Trustee/Respondent	:

CERTIFICATION OF DEFAULT

AND NOW, comes secured Creditor, HSBC Bank USA, N.A., as Trustee, on behalf of the Certificate Holders of the Deutsche Alt-A Securities, Inc. Mortgage Pass-Through Certificates, Series 2007-AB1 c/o Select Portfolio Servicing, Inc., (“Movant”) by and through its counsel, Hladik, Onorato & Federman, LLP, and files this Certification of Default to obtain an order for Relief from the Automatic Stay due to Debtors’ failure to comply with the terms of the Stipulation resolving a Motion for Relief from Stay, and avers the following:

1. On October 13, 2023, the attached Stipulation was approved by the Court. See Exhibit “A” attached.
2. Debtor did not continue to make the post-petition payments as required by the Stipulation. On November 4, 2024, Movant sent a Notice of Default to the Debtor and Debtor’s Counsel, Lawrence S. Rubin, Esquire, as required by paragraph 5 of the Stipulation. See Exhibit “B” attached.
3. Per the terms of the Stipulation if the default is not cured within ten (10) days of the date of the written notice of default, Movant may file a Certification of Default and an Order shall be entered granting Movant relief from the stay.

4. As of the date of the filing of this Certification of Default, more than ten (10) days have passed and the default has not been cured. Movant has not received the following payments:

Regular Monthly Payments (May 1, 2024 at \$2,098.93 each).....	\$2,098.93
Regular Monthly Payments (June 1, 2024 through November 1, 2024 at \$2,463.23 each).....	\$14,779.38
Suspense Balance:.....	(\$197.31)
TOTAL POST-PETITION ARREARS.....	\$16,681.00

WHEREFORE, Movant respectfully requests this Honorable Court ORDER that Movant be granted Relief from the Automatic Stay.

Respectfully Submitted:

/s / Danielle Boyle-Ebersole, Esquire
Danielle Boyle-Ebersole, Esquire
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Date: 11/18/2024